

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 MAY -3 A 9:48

UNITED STATES OF AMERICA)

v.)

ANDRES MARTINEZ)
a/k/a Castro Casimiro)
a/k/a Joel Zequeira)
a/k/a Sacaida, et. al.)

Defendants.)

Criminal No. M-04-1685-CBS

U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO UNSEAL COMPLAINT (2/26/04), SUPPORTING SA JEAN DROUIN
AFFIDAVIT (2/26/04), AND SUPPORTING AFFIDAVIT OF SA JEAN DROUIN
(5/1/04) FOR ELEVEN SEARCH WARRANTS

Now comes the United States of America (the "government"), and hereby moves this Honorable Court to unseal the CRIMINAL COMPLAINT in the above-referenced case (dated 2/26/04), the Affidavit of SA JEAN DROUIN AFFIDAVIT in support of the Criminal Complaint (also dated 2/26/04), as well as the AFFIDAVIT OF SA JEAN DROUIN (dated 5/1/04) in support of eleven (11) Search Warrants issues by the Court on May 1, 2004 also in connection with this case.

The government hereby moves for such an Order from the Court as most of the defendants charged in the above entitled Criminal Complaint were arrested on May 1, 2004, pursuant to arrest warrants also issued by the Court on February 26, 2004. As such, it is the interest of justice to unseal the above listed

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documents and pleadings currently under seal in this criminal matter.

Respectfully submitted,

MICHAEL J. SULLIVAN
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Dated: May 3, 2004